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OFFICE OF THE
EXECUTIVE SECRETARY

April 6, 2001

By Hand



David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

RE: Docket to Establish Generic Performance Measurements, Benchmarks and Enforcement
Mechanisms for BellSouth Telecommunications, Inc.
Docket No. 01-00193

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of AT&T's Comments in response to Issue 2. Additionally, AT&T also supports the filing being made by SECCA addressing Issue 1. These comments are in response to the TRA's Notice of Filing in the above- referenced proceeding. If you have questions, please call me.

Sincerely,


Jim Lamoureux 

Encls.

cc: Parties of service

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY**

IN RE:)	
Docket to Establish Generic)	
Performance Measurements, Benchmarks)	
and Enforcement Mechanisms for)	
BellSouth Telecommunications, Inc.)	Docket No. 01-00193
)	

AT&T'S COMMENTS

On March 12, 2001, the Tennessee Regulatory Authority ("TRA") issued its Notice of Filing in the above referenced proceeding. AT&T Communications of the South Central States, Inc. and TCG MidSouth, Inc. (collectively "AT&T") hereby respectfully submit Comments on Issue 1 (Performance Measurements) and Issue 2 (Change Control Process).

- 1. Should the performance measurements, benchmarks and enforcement mechanisms as adopted be revised? If so, specify what changes should be made and provide supporting rationale.**

AT&T's Comments regarding this issue are incorporated in the SECCA filing being made today.

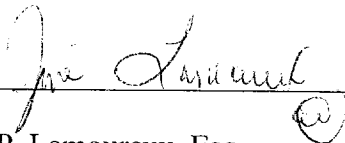
- 2. Should a change control process be considered in this docket? If so, provide supporting rationale and details of the process you recommend?**

Yes. AT&T believes that the TRA should consider adoption of the Change Control Process ("CCP") Document in this docket. The CCP Document as it exists today has not been recognized or adopted by any regulatory body in any of the nine states in which BellSouth conducts business. The CCP Document is not a contract, in its present state, the CCP Document is nothing more than a voluntary garden club charter that BellSouth may elect to ignore whenever it finds it convenient to do so. Provisions within the document regarding escalation and dispute resolution, that indicate that CLECs have a method by which they can seek relief or the redress of grievances up to and including mediation or complaint proceedings are simply words on paper.

In order for the change control process to become legally binding upon BellSouth and subject to effective regulatory oversight, this Authority must specifically place the Change Control Document under its supervision, adopt the Document and specifically order BellSouth to implement CLEC initiated process change requests that the Authority determines have merit, and direct BellSouth to comply with the process. On a going forward basis each new Version of the Document would be filed with the Authority, presumed valid, and be the vehicle under which CLECs could seek timely relief if necessary.

In its currently pending arbitration proceeding (Docket No. 00-00079) AT&T has provided significant and substantial testimony regarding the CCP process,¹ the need for change, and the jurisdiction this Authority has to impact the process. AT&T requests the Authority recognize this existing testimony as rationale in support of including consideration of the CCP in the Performance Measurement Docket. Additionally, AT&T submits the attached table comparing the current state of BellSouth's CCP to FCC guidance provided in its Bell Atlantic New York 271 Order and a September 27, 1999, letter to US West.

Respectfully filed this 6th day of April, 2001.

A handwritten signature in cursive script, reading "James P. Lamoureux", is written over a horizontal line. To the right of the signature, there is a small circular mark or stamp.

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Attorneys for AT&T Communications of the
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¹ Pre-filed direct testimony of Jay M. Bradbury, pages 44-79, December 20, 2000; pre-filed rebuttal testimony of Jay M. Bradbury, pages 17-43, January 8, 2001; and pre-filed supplemental testimony of Jay M. Bradbury, April 2, 2001.

BellSouth's Change Control Process Lacks Required Attributes

FCC Guidance		Status
CLEC Participation		CLECs have input however BellSouth retains a veto power over all decisions.
Procedure Documentation for		CCP Document addresses each area however BellSouth's internal processes are being revised and will require revision of the CCP. BellSouth has not proactively provided CLECs with information on the changes to its internal processes or sought CLEC input for use in developing its new processes.
<ul style="list-style-type: none"> •Operational Changes •Technology Changes •Additional Functionality •Regulatory Mandates •Defect Correction 		
Prioritization and Stratification of Changes		The CCP contains an Outage Notification Process and 5 Change Request stratifications. CLEC prioritizations are overridden by BellSouth
Schedules for Notifications and Publication of Documentation		Currently in state of flux as BellSouth revises its internal processes. Intervals do not meet CLEC business needs. Confusion exists between "notification" and "documentation" schedule requirements.
A Testing Environment and Minimum 30 Day Test Window for New Releases		Does not exist in BellSouth. Development is underway for use with Release 9.4 scheduled for 6/30/01.
A Go/No Go Decision Process to Preclude Premature Implementation by the BOC		Process does not exist in BellSouth.
Versioning of Releases		Included in BellSouth process.
Memorialization of the Process, Including a Means by Which the Process can be Modified		The current CCP Document is Version 2.1.A. An update is expected on March 26. BellSouth retains and exercises veto power over CLEC consensus decisions to modify the process and implements modifications it desires unilaterally.
Dispute Resolution Process for CLECs, Specific to Change Management Disputes		The CCP Document contains a dispute resolution process however no regulatory body has adopted the document or established any specific processes to handle such disputes.
Followed Consistently Over Time		BellSouth regularly ignores CCP requirements.
Subject to Regulatory Oversight and Enforcement.		No regulatory authority in any BellSouth state has taken recognition of the CCP Document. The Georgia PSC Performance Plan contains penalties for late notifications and documentation but they cannot be executed as written.